



Process of Banning Diclofenac in Cambodia

Summary by Ny Naiky , Vulture Project Coordinator of NatureLife Cambodia

Diclofenac is toxic to *Gyps* vultures if not sole cause of declines in Cambodia, diclofenac is the main cause of vulture decline in South Asia.

In 2015, the Cambodia Vulture Working Group (CVWG) conducted household and pharmacy surveys on the use of veterinary drugs (Diclofenac and NSAIDs) but found no record of diclofenac and other NSAIDs.

In May 2018, ACCB staff members of CVWG found diclofenac available in the Cambodia market in Siem Reap Province.

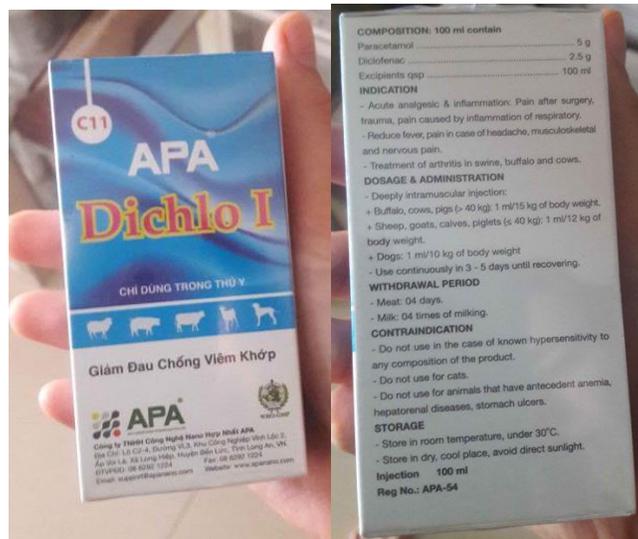


Figure 1: Diclofenac first found in Siem Reap Province

CVWG was deeply concerned after this finding that diclofenac veterinary medicine had become available in the Cambodian market, therefore we had to work hard to advocate with the Cambodian government to ban this drug. The Ministry of Agriculture Forestry and Fishery (MAFF) issued a decree to ban the use and import of this veterinary medicine on 15 July 2019 in response to our efforts. We are pleased to summarize and divide our advocacy work into six steps as follows:

Step 1 Concern letter: CVWG members wrote a joint official letter (below) to MAFF to express our concern and also include a summary of why diclofenac is an issue for vultures, mentioning the solution for this matter.



H.E. Veng Sokhon
Ministry of Agriculture Forestry and Fisheries
Cambodia

30 May 2018

Re: Concerns over potential impacts on vultures due to sale of veterinary Diclofenac

Your Excellency

The Cambodian Vulture Working Group would like to extend its highest consideration to the Royal Government of Cambodia.

The Cambodian Vulture Working Group is a partnership whose members comprise government (Ministry of Environment and Forestry Administration) and non-governmental (BirdLife International, Wildlife Conservation Society (WCS), World Wide Fund for Nature (WWF), and Angkor Centre for the Conservation of Biodiversity (ACCB)) organisations that have been working closely together since 2003 with the aim to prevent the extinction of Cambodia's vulture populations, and restore their population size to levels consistent with their long-term survival by mitigating threats throughout their range.

Cambodia supports globally important populations of three Critically Endangered vulture species. In the past, all three species were abundant in India, however they declined catastrophically in the last fifteen years. The reason for their rapid decline is because vultures quickly die after eating dead cows that had been treated with veterinary Diclofenac.

Because Diclofenac is so toxic to vultures, the governments of many countries (including India, Nepal and Pakistan) have banned veterinary Diclofenac and other similar drugs (Aceclofenac, Carprofen, Flunixin, Ketoprofen, Nimesulide and Phenylbutazone), which are also toxic to vultures. At the same time, they have promoted the use of the veterinary drug Meloxicam which is not toxic to vultures.

The Cambodian Vulture Working Group would like to request the Ministry of Agriculture, Forestry and Fisheries to develop a *prakas* banning the use of Diclofenac for veterinary purposes in Cambodia. The NGO representatives of the Cambodia Vulture Working Group would like to request a meeting with Your Excellency for further dialogue about this issue.

Please accept, Your Excellency, the assurance of our highest regards.

Yours Faithfully,



- Copied:
1. MoE CVWG rep
 2. FA CVWG rep

Step 2 Collection of evidence and scientific reports: After submitting the concern letter to the Ministry of Agriculture Forestry and Fishery, CVWG searched and collected supporting reports and evidence about the negative impact of veterinary diclofenac to share with government officers. More documents and reports were shared by SAVE members (especially reports from India, Nepal, and Bangladesh). We also share banning decrees that have been issued by the Indian and Nepal governments to our government focal points for review.

Step 3 Series of consultation meetings: On 05th October 2018, CVWG submitted a letter to MoE about the concerns over potential impacts on vultures due to the sale of veterinary diclofenac in Cambodia. To request Ministry of MoE support follow-up for intervention with MAFF to ban the import and use of veterinary drug diclofenac. The letter was supported by a report on the catastrophic effect of the veterinary drug diclofenac on vultures and the use of meloxicam as a safe alternative. CVWG requested the Ministry of Environment, as biodiversity and natural protection focal point of the Cambodian Government, to help in requesting the Ministry of Agriculture, Forestry and Fisheries developing an official proclamation (*'prakas'*) and ban of the import and use of diclofenac for veterinary purposes in Cambodia.

06th November 2018, on behalf of CVWG, BirdLife International Cambodia Programme submitted the summary report about the catastrophic effect of the veterinary drug diclofenac on vultures and the use of meloxicam as a vulture-safe alternative (both English and Khmer) to MAFF. The letter stated that the CVWG was requesting MAFF to consider developing a '*prakas*' banning the use of diclofenac for veterinary purposes in Cambodia. CVWG offered to support and work with the focal government department on this specific issue.

On 19th November 2018, CVWG had a meeting with MoE to discuss a solution on advancing the diclofenac banning process by: joint meeting of MAFF, MoE, CVWG, and another respected scientist, explaining the threat and projected impact on vulture populations.

An additional element was needed to conduct awareness-raising at all vulture project sites. There was a further meeting between GDANCP and CVWG after CVWG met again with MAFF.

It was agreed at these meetings to request the permission from the minister of MoE for the following:

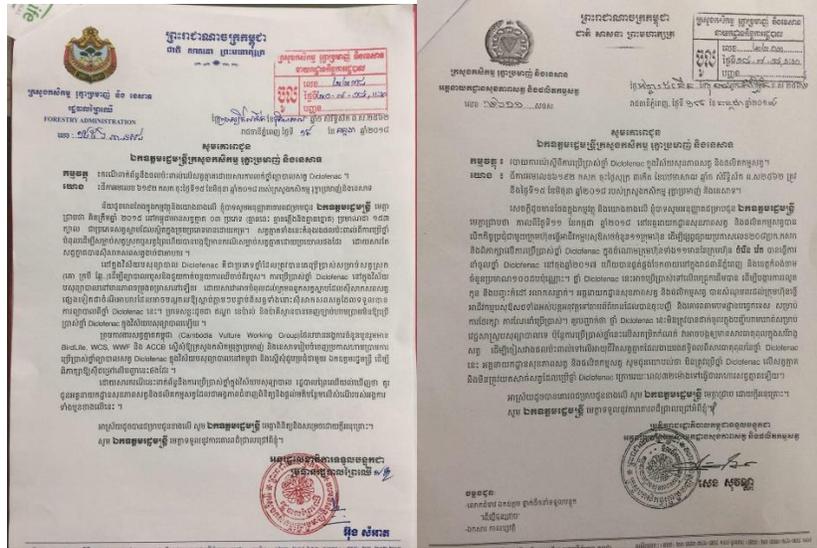
1. to conduct a provincial awareness raising at all vulture project province sites about the negative impact of ~~di~~diclofenac veterinary drug.
2. Surveys of veterinary drugs use in cattle farms (using diclofenac or not).
3. Develop a short film about the diclofenac ban and play on popular TV Channel.

CVWG submitted a second letter to MAFF, where CVWG also expressed the commitment to work together with MAFF focal departments on drafting a decree and also providing additional information.

The MAFF minister sent his secretary of state to meet with the CVWG delegate as requested on 14th December 2018. During the meeting, CVWG presented the current Cambodia Vulture Conservation Status and the details of diclofenac being toxic on vultures (case study from South Asian Countries).

Minutes of the meetings were developed and officially send by BirdLife Cambodia on behalf of CVWG to the Minister of MAFF.

Step 4: Work with focal points: After MAFF received and reviewed the initial ban request letters and minutes or other evidence, MAFF Ministry have developed their internal report or justification for their management committee to take the final decision. In this case, MAFF has assigned the Forestry Administration and General Department of Animal Health and Production to develop justification and give their recommendation. CVWG coordinators and senior people of CVWG had several face-to-face meetings with the head of the MAFF department and with other technical officers at these two general departments to provide additional information.



Justification developed by Forestry Administration and General Department of Animal Health and Production

Step 5: Support for the focal general departments of MAFF to defend their justification: Before the Minister made the final decision and issued a decree, an internal meeting was organized and provided the opportunity for the focal general department to defend their justification. In this case, MAFF assigned the General Department of Animal Health and Production to take the lead. Therefore, CVWG worked closely with this general department since early 2019. This involved helping improve the justification report, draft presentation, and drafting the banning decree.

Step 6: Finalize banning decree and awareness: After the General Department of Animal Health and Production successfully defended their justification on 22 May 2019, the CVWG coordinator (BirdLife Cambodia) continued to work closely with this general department to finalize the Ministerial decree, providing comments and getting the Minister’s signature on 15 July 2019.

To build a close relationship with the General Department of Animal Health and Production, CVWG invited them to join the CVWG at a core member meeting as observers and later on invited them to become a member of CVWG. Moreover, CVWG also developed a joint implementing actions plan to ensure new banning decree effectively enforces, key activities including conducting awareness and enforcement about this new banning decree. For example, on 12 September 2019, CVWG and the General Department of Animal Health and Production co-organized the international vulture awareness day and produced thousands of posters for the provincial department of agriculture forestry and fishery to conduct extension awareness with animal pharmacies.

